RECEIVED



2005 MAR -4 PM 3: 57

BellSouth Telecommunications, Inc

333 Commerce Street

Suite 2101

Nashville, TN 37201-3300

T.R.A. DOCKET ROOM

Guy M Hicks General Counsel

615 214 6301 Fax 615 214 7406

guy hicks@bellsouth.com

March 4, 2005

VIA HAND DELIVERY

Hon. Pat Miller, Chairman Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243

Re Docket to Establish Generic Performance Measurements, Benchmarks and Enforcement Mechanisms for BellSouth Telecommunications, Inc. Docket No. 01-00193

Dear Chairman Miller:

Consistent with the terms of the Settlement Agreement relating to performance measurements approved by the Authority in this proceeding, BellSouth is filing fifteen copies of a Notification Report for the April 2005 data month and a Preliminary Notification Report for the data month of May 2005 These Reports are being filed for informational purposes with all of the state public service commissions in BellSouth's nine-state region.

Copies of the enclosed are being provided to counsel of record Thank you for your assistance in this regard.

Very truly yours,

Guy M. Hicks

GMH ch



BellSouth Telecommunications, Inc Legal Department 1025 Lenox Park Boulevard Suite 6C01 Atlanta, GA 30319-5309

March 1, 2005

Lisa S Foshee General Counsel - Georgia

404 986 1718 Fax 404 986 1800

lisa foshee@bellsouth.com

DELIVERED BY HAND

Mr Reece McAlister Executive Secretary Georgia Public Service Commission 244 Washington Street, S W Atlanta, Georgia 30334-5701

Res

Performance Measurements for Telecommunications Interconnection, Unbundling, and Resale, Docket No 7892-U

Dear Mr McAlister:

Re:

Consistent with the Commission's July 19, 2002 Order, BellSouth Telecommunications, Inc ("BellSouth") is filing a Proposed Notification Report for the April 2005 data month and a Preliminary Notification Report for the data month of May 2005 These proposed changes will be discussed at the March 7, 2005 industry conference call.

There is one additional matter that BellSouth would like to bring to the attention of the Commission and the parties. Upon completion of Encore Release 17.0, which was implemented on November 21, 2004, it was determined that some LSRs previously counted as Partially Mechanized were being incorrectly counted as Fully Mechanized. BellSouth will correct this issue with the January 2005 data month

Enclosed herein, please find an original and seventeen (17) copies, as well as an electronic version, of these Data Notification Reports. I would appreciate your filing same in the above-referenced docket and returning the two (2) extra copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

Thank you for your attention to this matter.

Yours very truly,

Lisa S. Foshee

LSF nvd Enclosures

cc Mr Leon Bowles (w/enclosure) (via electronic mail)

Mr Patrick Reinhardt (w/enclosure) (via electronic mail)
Parties of Record (w/enclosure) (via electronic mail)

574848/574848/574855

PARTIES OF RECORD Docket No. 7892-U

Ms. Christiane L Sommer, Director Consumers' Utility Counsel Division 2 Martin Luther King, Jr. Drive Suite 356, East Tower Atlanta, GA 30334-4600 404-656-0233 (o) tiane.sommer@cuc.oca.state.ga.us

Suzanne W Ockleberry, Esquire AT&T
1230 Peachtree Street, NE
4th Floor
Atlanta, GA 30309
404-810-7175 (o)
sockleberry@att.com

Mr. John P Sılk Georgia Telephone Association 1900 Century Boulevard, Suite 8 Suite 8 Atlanta, GA 30345 404-321-5368 (o) isilk@gta.org

Stephen S Melnikoff, Esquire
General Attorney – Regulatory Law Office
U. S. Army Legal Scrvices Agency
Department of the Army
901 N Stuart Street, Suite 700
Arlington, VA 22203-1837
703-696-1643 (o)
stephen.melnikoff@hqda.army.mil

Peter C Canfield, Esquire Dow Lohnes & Albertson One Ravinia Drive, Suite 1600 Atlanta, GA 30346 770-901-8800 (o) pcanfield@dlalaw.com Newton M Galloway, Esquirc Galloway & Lyndall, LLP The Lewis-Mills House 406 North Hill Street Griffin, GA 30223 770-233-6230 (o) ngalloway@gallyn-law.com

Walt Sapronov, Esquire Gerry & Sapronov, LLP Three Ravinia Drive Suite 1455 Atlanta, GA 30346-2131 770-395-9100 (o) info@gstelecomlaw.com

Daniel S. Walsh, Esquire
Attorney General Office
Department of Law-State of Georgia
40 Capitol Square, S.W.
Atlanta, GA 30334-1330
404-657-2204 (o)
dan.walsh@law.state.ga.us

Charles F. Palmer, Esquirc Troutman Sanders LLP 5200 NationsBank Plaza 600 Peachtree Street, NE Atlanta, GA 30308-2216 404-885-3402 (o) charles.palmer@troutmansanders.com

Nanette S Edwards, Esquire
Regulatory Attorney
ITC^DeltaCom
7037 Old Mansion Pike, Suite 400
Huntsville, AL 35806
256-382-3856 (o)
nedwards@itcdeltacom.com

Anne F Gerry, Esquire
Arnall Golden & Gregory, LLP
[Counsel for Broadslate, NorthPointe]
171 17th Street
Suite 2100
Atlanta, GA 30363
404-873-8536 (o)
anne.gerry@agg.com

D Mark Baxter, Esquire Thomas M Browder, III, Esquire Stone & Baxter, LLP 577 Mulberry Street Suite 1111 Macon, GA 31201 478-750-9898 (o) mbaxter@stoneandbaxter.com tbrowder@stoneandbaxter.com

David I Adelman, Esquire
Charles B Jones III, Esquire
Hayley B. Riddle, Esquire
Sutherland, Asbill & Brennan LLP
999 Peachtree Steeet, N E
Atlanta, GA 30309-3996
404-853-8206 (o)
[Counsel for ITC^DeltaCom, WorldCom]
david.adelman@sablaw.com
clay.jones@sablaw.com
hayley.riddle@sablaw.com

Charles A Hudak, Esquire
Friend, Hudak & Harris, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346-2131
770-399-9500 (o)
[Counsel for Time Warner Telecom]
chudak@fh2 com
robin.jackson@twtelecom.com
carolyn marek@twtelecom.com

Dulaney L O'Roark III, Esquire MCI, Inc Concourse Corporate Center Six 6 Concourse Parkway, Suite 3200 Atlanta, GA 30328 [Counsel for WorldCom, Inc] 770-284-5498 (o) de oroark@mci com

William R. Atkinson, Esquire Sprint Communications Company L P. 3065 Cumberland Boulevard Mailstop GAATLD0602 Atlanta, GA 30339 404-649-4882 (0) bill.atkinson@mail.sprint.com

Genevieve Morelli, Esquire Andrew M. Klein, Esquire Kelley Drye & Warren LLP [Counsel for KMC Telecom] 1200 Nineteenth Street, N.W. Washington, DC 20036 202-877-1257 (o) gmorelli@kelleydrye.com aklein@kelleydrye.com

Mark M. Middleton, Esquire Mark M. Middleton, P C. 1100 Spring Street, Suite 380 Atlanta, GA 30309 404-806-0808 (o) [Counsel for CTAG] mark@middletonlaw.net

Charles E Watkins, Esquire
Senior Counsel
Covad Communications Company
1230 Peachtree Street, N.E., 19th Floor
Atlanta, GA 30309
[Counsel for Covad Communications]
404-942-3492 (o)
gwatkins@covad com
jbell@covad.com

Rose Mulvany Henry, Esquire Birch Telecom of the South, Inc 2020 Baltimore Avenue Kansas City, MO 64108 [Counsel for Birch Telecom] 816-300-3000 (o) rmulvany@birch.com Eric J Branfman, Esquire Swidler & Berlin 3000 K Street, N W Suite 300 Washington, DC 20007 202-945-6940 (o) ebranfman@swidlaw.com

Frank B. Strickland, Esquire Strickland Brockington & Lewis [Counsel for e.spire] Midtown Proscenium - Suite 2000 1170 Peachtree Street, N E Atlanta, GA 30309 404-885-5741 (o) (bs@sbllaw.net) Margaret Ring, Esquire
Director Regulatory
& Governmental Affairs
Network Telephone
815 South Palafox Street
Pensacola, FL 32501
[Counsel for Network Telephone]
margaret.ring@networktelephone.net

PROPOSED APRIL 2005 DATA NOTIFICATION

BellSouth proposes making the changes described in this document to generate results for the April 2005 data month. Results for the April 2005 data month will be posted as follows:

Preliminary results May 20, 2005 Final results May 31, 2005

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement ("SQM") Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

ENCORE Releases may affect monthly data flows from the source systems (e.g., LEO, LESOG, etc.) that PMAP uses to calculate measurements. Bellsouth will make changes to PMAP to ensure that data continues to be correctly captured as ENCORE Releases are implemented.

Ordering Measurements

(1) Affected Measures. O-3 & O-4

Description of Change. Currently, the Flow-Through code is incorrectly counting LSRs submitted via ELMS6 to cancel previous submissions as BST errors. BellSouth proposes to correctly classify these LSRs as Flow-Through. This proposed change was Item (1) on the Preliminary April Data Notification filed on February 1, 2005. (RQ6010)

Impact of Change For December 2004 data, there were 1036 of these LSRs. Flow Through percentages would have increased less than 1%.

(2) Affected Measures: O-3 & O-4

Description of Change: Currently, Flow-Through LSRs submitted via XML or EDI, which have related PONs (RPONs) and are manually clarified, are being incorrectly counted as BellSouth errors. BellSouth proposes to correct the code to accurately report these LSRs as CLEC errors. This proposed change was Item (2) on the Preliminary April Data Notification filed on February 1, 2005 (RQ6011)

Impact of Change For November 2004, there would have been a .002% increase in the results

(3) Affected Measures. OSS-2

Description of Change Currently, performance for EDI interactive agent is not reported for this measure. BellSouth proposes to report interactive agent availability minutes as a part of EDI (RQ6078)

Impact of Change: From August 2004 to January 2005, there were no interactive agent outages.

(4) Affected Measures: OSS-2

Description of Change: Currently, the raw data for OSS-2 includes a listing for CLEC TAFI, LMOS, and TAFI records, which are associated only with the M&R Interface Availability Measure (OSS-3). BellSouth proposes to remove this erroneous raw data from the file. (RQ6164)

Impact of Change: None to measurement results.

Provisioning Measurements

(5) Affected Measures: P-2A

Description of Change: When CSOTS was established, it was updated once a day. To account for the possibility that a CLEC might not be notified of a Non-Mechanized Jeopardy status for up to one day after it occurred, the Non-Mechanized Jeopardy Notice Interval was reduced by I day. CSOTS is now updated real time and BellSouth proposes to modify the PMAP code to report the actual measured Jeopardy Notice Interval. This proposed change was Item (3) on the Preliminary April Data Notification filed on February 1, 2005. (RQ5998)

Impact of Change For November 2004, in Georgia, the Non-Mechanized Average Jeopardy Notice Interval (provided in advance of jeopardy) for DS1Loops would increase by 8.87%.

(6) Affected Measures: P-4

Description of Change: Currently, the CLEC numerator on the 12 month report is reported in whole rounded numbers. BellSouth proposes to change the CLEC numerator on the report to 2 decimal places which is already used to calculate the result. This

proposed change was Item (4) on the Preliminary April Data Notification filed on February 1, 2005. (RQ6029)

Impact of Change None to measurement results.

Change Management Measurements

(7) Affected Measures. CM-8

Description of Change: Currently, the report for this measurement is not disaggregated as stated in the SQM. BellSouth proposes to correct PMAP to correctly display these disaggregations (RQ6071)

Impact of Change: None to the aggregate measurement results.

PRELIMINARY MAY 2005 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the May 2005 data month. Results for the May 2005 data month will be posted as follows.

Preliminary results June 20, 2005 Final results June 30, 2005

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

ENCORE Releases may affect monthly data flows from the source systems (e.g., LEO, LESOG, etc.) that PMAP uses to calculate measurements. Bellsouth will make changes to PMAP to ensure that data continues to be correctly captured as ENCORE Releases are implemented.

Provisioning Measurements

(1) Affected Measures: P-3 (Florida and Tennessee)

Description of Change Currently in Florida & Tennessee, BellSouth is excluding orders that are canceled on the due date but are not zero due dated orders. Per the SQM, only orders canceled prior to the due date and zero due dated orders canceled on the due date should be excluded from this measure. BellSouth proposes to exclude only orders canceled prior to the due date and zero due dated orders canceled on the due date from this measure (RQ6033)

Impact of Change: There is no change in reported measurement results for BST. The impact to the CLEC results is less than 0.01%.

(2) Affected Measures: P-2, P-3, P-4, P-5, P-6, P-9, P-10 & P-11

Description of Change: Currently, certain administrative orders (i.e., "C" orders with D&E entries) were not being excluded in the code. BellSouth proposes to correct the code to properly exclude these orders. (RQ6039)

Impact of Change For November 2004, in Florida, for PMIA BellSouth Retail Residence, 19843 records would have been excluded from the volume of completed orders with a change in the missed appointment rate from .67% to .69%. For Florida CLEC Resale Residence, one (1) record would have been excluded from the volume of completed orders with no change in the missed appointment rate (.37%).

(3) Affected Measures: P-7, P-7A, P-7B & P-7C

Description of Change. Currently, records are being excluded because WFA completion dates and service order completion dates do not match. BellSouth proposes to modify PMAP data processing to include these records if the WFA completion date is within 10 days of the service order completion date. A 10-day interval should capture virtually all instances for this situation. (RQ6059)

Impact of Change: For December 2004, in Florida, two service orders (4 items) were excluded from CCCI. The results were:

929/933 = 99.5712% Adjusted results: 933/937 = 99.5731%

For December 2004, in Georgia, three service orders (13 items) were excluded from CCCI. The results were:

209/209 = 100%

Adjusted results.

222/222 = 100%

M&R Measurements

(4) Affected Measures: MR-3 (Florida and Tennessee)

Description of Change: Currently, the Z scores are not being calculated for Digital Loops <DS1 and Digital Loops >= DS1. Bellsouth proposes to begin calculating the Z score for Digital Loops <DS1 and Digital Loops >= DS1 product groups. (RQ6112)

Impact of Change: None to measurement results.

CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2005, a copy of the foregoing document was served on the following parties, via the method indicated:

[] Hand[] Mail[] Facsimile[] Overnight[x] Electronic	Martha M. Ross-Bain AT&T 1200 Peachtree Street, Suite 8100 Atlanta, Georgia 30309 rossbain@att.com
[] Hand	Henry Walker, Esquire
[] Mail	Boult, Cummings, et al.
[] Facsimile	P. O. Box 198062
[] Overnight	Nashville, TN 37219-8062
[x] Electronic	hwalker@boultcummings.com
[] Hand	James Murphy, Esquire
[] Mail	Boult, Cummings, et al.
[] Facsimıle	P. O. Box 198062
[] Overnight	Nashville, TN 37219-8062
[x] Electronic	imurphy@boultcummings.com
[] Hand	Charles B. Welch, Esquire
[] Mail	Farris, Mathews, et al.
[] Facsimile	618 Church St., #300
[] Overnight	Nashville, TN 37219
[x] Electronic	cwelch@farrismathews.com
[] Hand[] Mail[] Facsimile[] Overnight[x] Electronic	Dana Shaffer, Esquire XO Communications, Inc. 105 Malloy Street Nashville, TN 37201 dshaffer@xo.com